

**JUDGE KOELTL**  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

08

CV 00410

ST. PAUL TRAVELERS INSURANCE  
COMPANY LTD.

Plaintiff,

-v-

M/V "MADAME BUTTERFLY", her  
engines, tackle, boilers, etc., et al.

Defendant.

Case No.

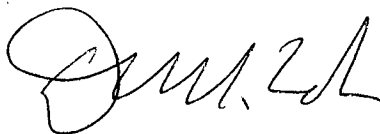
**RECEIVED**  
JAN 16 2008  
**Rule 7.1 Statement**  
U.S.D.C. S.D.N.Y.

Pursuant to Federal Rule of Civil Procedure 7.1 [formerly Local  
General Rule 1.9] and to enable District Judges and Magistrate Judges of the Court  
to evaluate possible disqualification or recusal, the undersigned counsel for  
Plaintiff St. Paul Travelers Insurance Company Ltd. (a private non-governmental party)

certifies that the following are corporate parents, affiliates and/or subsidiaries of  
said party, which are publicly held.

Please see the attached document which list all corporate parents, affiliates and/or subsidiaries of said  
party, some of which are publicly held.

**Date:** Jan. 16, 2008



**Signature of Attorney**

**Attorney Bar Code:** DL 0460

## ST. PAUL TRAVELERS INSURANCE COMPANIES

business previously underwritten by Royal & Sun Alliance in the U.S., without assuming past liabilities. The acquisition included renewal rights for directors and officers liability, employment practices liability, fiduciary liability, crime and miscellaneous errors and omissions liability insurance.

In addition, in 2001 and 2002, Nuveen Investments made two strategic acquisitions — in July 2001, Symphony Asset Management LLC, an institutional investment manager based in San Francisco with approximately \$4 billion under management, and in August 2002, NWQ Investment Management Company, Inc., an asset management firm based in Los Angeles with approximately \$6.9 billion of assets under management in both retail and institutional managed accounts. At year-end 2002, Nuveen Investment's assets under management totaled \$79.7 billion.

In May 2003, St. Paul also purchased the right to seek renewal of certain existing commercial insurance business written by Kemper Insurance Companies in the U.S. Under the agreement, St. Paul has obtained the right to seek to renew a broad portfolio of property/casualty business. St. Paul did not assume any past liabilities on this transaction either. The transaction included renewal rights for small commercial, middle market commercial, inland and ocean marine, and architects' and engineers' professional liability.

A.M. Best assigns 11 distinct ratings to the domestic operations within the St. Paul Travelers Group. The rating assigned to the first rating unit — St. Paul Travelers Insurance Companies — applies to its 28 pool members, led by the Travelers Indemnity Company and 17 reinsured affiliates. The rating also applies to Travelers Casualty and Surety Company of America, which A.M. Best considers to be a core and integral member of The St. Paul Travelers Group. As noted above, the rating of St. Paul Travelers Insurance Companies is based on the consolidation of virtually all of the domestic business of these companies as well as 15 other separately rated domestic affiliates within the St. Paul Travelers Group.

A second distinct rating is assigned to Discover Reinsurance Company, a company which principally provides commercial auto liability, general liability, workers' compensation and property coverages, serving retail brokers and insureds that utilize the alternative risk transfer market. A third rating is assigned to First Trenton Indemnity Company, a special purpose company which specializes in personal automobile and homeowners insurance in New Jersey only. A fourth rating is assigned to The Premier Insurance Company of Massachusetts, an exclusive writer of private passenger automobile policies in the Massachusetts marketplace. The fifth rating is assigned to First Floridian Auto and Home Insurance Company. Formed in 1996, First Floridian acts as a special purpose personal lines carrier dedicated to Florida only. The sixth rating applies to TNC Insurance Group, a group comprised of seven pool participants, which lends St. Paul Travelers underwriting expertise in specialty lines, particularly relating commercial automobile business. A seventh rating applies to — Red Oak Insurance Company, a subsidiary of First Trenton Indemnity Company, which is in run-off. An eighth rating is assigned to American Skyline Insurance Company, Inc., which is majority owned by The St. Paul Travelers Companies, Inc. Three additional ratings apply to Associates Insurance Company, Associates Lloyds Insurance Company and Commercial Guaranty Insurance Company, members of the Associates group of insurance companies, which also are in run-off. In addition, A.M. Best assigns ratings to St. Paul Travelers Insurance Company Limited and St. Paul Reinsurance Company in London, St. Paul Guarantee Insurance Company in Canada and Afianzadora Insurgente SA in Mexico. For a detailed discussion of all of the above rating assignments on all these groups and companies, please refer to their dedicated reports.

## CORPORATE STRUCTURE

| AMB   | COMPANY NAME                   | DOMICILE       | % OWN  |
|-------|--------------------------------|----------------|--------|
| 12075 | St Paul Travelers Cas, Inc.    | MN             |        |
| 12042 | St Paul Fire & Marine Ins Co   | MN             | 100.00 |
| 11568 | Amcon Reinsurance Inc          | Cayman Islands | 100.00 |
| 11678 | Discover Specialty Ins Co      | IL             | 100.00 |
| 58165 | MMedica Insurance Limited      | Ireland        | 100.00 |
| 58501 | Northbrook Holdings Inc        | DE             | 100.00 |
| 02002 | Discover Prop & Cas Ins Co     | IL             | 100.00 |
| 04046 | St Paul Protective Ins Co      | IL             | 100.00 |
| 11026 | St Paul Fire & Casualty Ins Co | WI             | 100.00 |
| 11027 | St Paul Guardian Ins Co        | MN             | 100.00 |
| 11020 | St Paul Mercury Insurance Co   | MN             | 100.00 |
| 02520 | St Paul Specialty Underg Inc   | DE             | 100.00 |
| 02220 | Athena Assurance Company       | MN             | 100.00 |
| 03846 | St Paul Medical Liab Ins Co    | MN             | 100.00 |
| 02516 | St Paul Surplus Lines Ins Co   | DE             | 100.00 |
| 11872 | Seaboard Surety Company        | NY             | 100.00 |
| 11299 | Unionamerica Holdings          | United Kingdom | 100.00 |
| 12031 | Unionamerica Acq Co Ltd        | United Kingdom | 100.00 |
| 03847 | Unionamerica Insurance Co Ltd  | United Kingdom | 100.00 |
| 50285 | United States Fid & Guar Co    | MD             | 100.00 |
| 87376 | Afianzadora Insurgente, SA CV  | Mexico         | 99.90  |
| 11208 | Discover Re Managers Inc       | DE             | 100.00 |
| 50277 | Discover Reinsurance Co        | IN             | 100.00 |
| 02061 | Fidelity & Guaranty Ins Co     | IA             | 99.90  |
| 02712 | Fidelity & Guaranty Ins Undrs  | WI             | 100.00 |

| AMB   | COMPANY NAME                   | DOMICILE       | % OWN  |
|-------|--------------------------------|----------------|--------|
| 12075 | GeoVera Insurance Company      | MD             | 100.00 |
| 12042 | Pacific Select Property Ins Co | CA             | 100.00 |
| 11568 | USF&G Insurance Company of MS  | MS             | 100.00 |
| 11678 | USF&G Specialty Insurance Co   | MD             | 100.00 |
| 58165 | Travelers Prop Cas Corp        | CT             | 100.00 |
| 58501 | Travelers Ins Group Holdings   | DE             | 100.00 |
| 02002 | Standard Fire Insurance Co     | CT             | 100.00 |
| 04046 | Auto Ins Co of Hartford        | CT             | 100.00 |
| 11026 | Travelers Personal Security    | CT             | 100.00 |
| 11027 | Travelers Prop Cas Ins Co      | CT             | 100.00 |
| 11020 | Travelers Personal Ins Co      | CT             | 100.00 |
| 02520 | Travelers Indemnity Company    | CT             | 100.00 |
| 02220 | Atlantic Insurance Company     | TX             | 100.00 |
| 03846 | Commercial Guaranty Lloyds Ins | TX             |        |
| 02516 | Charter Oak Fire Ins Co        | CT             | 100.00 |
| 11872 | First Floridian Auto & Home    | FL             | 100.00 |
| 11299 | First Trenton Indemnity Co     | NJ             | 100.00 |
| 12031 | Red Oak Insurance Company      | NJ             | 100.00 |
| 03847 | Gulf Group Lloyds              | TX             |        |
| 50285 | Gulf Insurance UK Holdings Ltd | United Kingdom | 100.00 |
| 87376 | St Paul Travelers Cas & Surety | United Kingdom | 100.00 |
| 11208 | Gulf Underwriters Ins Co       | CT             | 100.00 |
| 50277 | Northland Company              | MN             | 100.00 |
| 02061 | Commercial Guaranty Cas Ins    | IN             | 100.00 |
| 02712 | Commercial Guaranty Ins Co     | DE             | 100.00 |
| 50278 | Jupiter Holdings Inc           | MN             | 100.00 |
| 11134 | American Equity Insurance Co   | AZ             | 100.00 |
| 12061 | American Equity Specialty      | CA             | 100.00 |
| 10737 | Mendota Insurance Company      | MN             | 100.00 |
| 11656 | Mendakota Insurance Company    | MN             | 100.00 |
| 00712 | Northland Insurance Company    | MN             | 100.00 |
| 04869 | Northfield Insurance Co        | IA             | 100.00 |
| 04025 | Northland Casualty Company     | MN             | 100.00 |
| 02518 | Phoenix Insurance Company      | CT             | 100.00 |
| 04003 | Travelers Indem Co of Amer     | CT             | 100.00 |
| 02517 | Travelers Indemnity Co of CT   | CT             | 100.00 |
| 04461 | Travelers Prop Cas Co of Amer  | CT             | 100.00 |
| 11421 | Premier Insurance Co of MA     | MA             | 100.00 |
| 02222 | Select Insurance Company       | TX             | 100.00 |
| 11300 | TravCo Insurance Company       | CT             | 100.00 |
| 11767 | Travelers Commercial Cas Co    | CT             | 100.00 |
| 11302 | Travelers Home and Marine      | CT             | 100.00 |
| 03297 | Travelers Lloyds Ins Co        | TX             |        |
| 86988 | Travelers (Bermuda) Limited    | Bermuda        | 100.00 |
| 02001 | Travelers Casualty & Surety Co | CT             | 100.00 |
| 01744 | Farmington Casualty Company    | CT             | 100.00 |
| 86417 | St Paul Guarantee Ins Co       | Canada         | 100.00 |
| 03609 | Travelers Cas & Surety of Amer | CT             | 100.00 |
| 04465 | Travelers Casualty Ins Co Amer | CT             | 100.00 |
| 11024 | Travelers Casualty Co of CT    | CT             | 100.00 |
| 11025 | Travelers Commercial Insurance | CT             | 100.00 |
| 00241 | Travelers Excess & Surp Lines  | CT             | 100.00 |
| 01743 | Travelers Lloyds of Texas Ins  | TX             |        |
| 50725 | DMGI Holding Company Inc       | MD             | 82.00  |
| 12479 | American Skyline Ins Co Inc    | MD             | 100.00 |
| 72450 | Mountain Ridge Insurance Co    | VT             | 100.00 |
| 85363 | St. Paul Travelers Ins Co Ltd  | United Kingdom | 100.00 |
| 85545 | St Paul Reinsurance Co Ltd     | United Kingdom | 100.00 |

### St. Paul Travelers Group

## ST. PAUL TRAVELERS INSURANCE COMPANIES

385 Washington Street, St. Paul, MN 55102

Tel: 860-277-0111  
AMB#: 18674

Fax: 860-277-8012

### BEST'S RATING

Based on our opinion of the group's Financial Strength, it is assigned a Best's Rating of A+ (Superior). The group's Financial Size Category is Class XV. Refer to the Preface for a complete explanation of Best's Rating system and procedure.

To view a company's complete BEST'S COMPANY REPORT,  
refer to BEST'S INSURANCE REPORTS on CD-ROM,  
or go online at [www.ambest.com/bir](http://www.ambest.com/bir)

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